

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 18-CR-62 (PP-DEJ)

BRIAN L. GANOS,

Defendant.

ADDENDUM TO PLEA AGREEMENT

1. The United States of America, by its attorneys, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin, Scott J. Campbell, Zachary J. Corey, and Michael A. Carter, Assistant United States Attorneys, and the defendant, Brian L. Ganos, individually and by attorney Stephen P. Hurley, pursuant to Rule 11 of the Federal Rules of Criminal Procedure, enter into the following addendum to the parties' plea agreement, filed on June 3, 2019.

2. The parties acknowledge and agree that this addendum merely amends paragraphs 36, 37, and 38 of the plea agreement filed on June 3 and that all the other terms of the plea agreement shall remain unchanged and in full force and effect.

3. The sole purpose of this addendum is to allow the government to forfeit, as a substitute asset, the \$60,000 that Chicago Title Insurance Company paid to the government, to hold in escrow for potential forfeiture, pursuant to the Stipulation and Settlement Agreement Regarding Payment of Cash in Lieu of Real Property Located at N52 W34254 Gietzen Drive,

Oconomowoc, Wisconsin, filed in this criminal case on February 13, 2019 (R. 108). The parties agree that this addendum shall be interpreted in a manner consistent with that purpose.

Amendments to Three Forfeiture Provisions

4. The parties agree to add the following subparagraph (g) to paragraph 36 of the plea agreement:

- g. The sum of \$60,000, which Chicago Title Insurance Company paid to the government, to hold in escrow for potential forfeiture, pursuant to the Stipulation and Settlement Agreement Regarding Payment of Cash in Lieu of Real Property Located at N52 W34254 Gietzen Drive, Oconomowoc, Wisconsin, filed in this criminal case on February 13, 2019 (R. 108).

5. The parties agree to amend paragraph 37 of the plea agreement by adding, immediately after the phrase “only the net proceeds from the sale of the property items identified in paragraph 36” and before the dash, the additional phrase “*plus* the \$60,000 referenced in paragraph 36(g).”

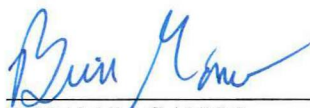
6. The parties agree to amend paragraph 38 of the plea agreement by adding at the end of the first sentence of that paragraph the phrase “and 36(g).”

[The rest of this page has intentionally been left blank.]

ACKNOWLEDGMENTS

I am the defendant. I am entering into this addendum to the plea agreement freely and voluntarily. I am not now on or under the influence of any drug, medication, alcohol, or other intoxicant or depressant, whether or not prescribed by a physician, which would impair my ability to understand the terms and conditions of this agreement. My attorney has reviewed every part of this addendum to the plea agreement with me and has advised me of its implications. I have discussed all aspects of this addendum with my attorney and I am satisfied that my attorney has provided effective assistance of counsel in connection with it.

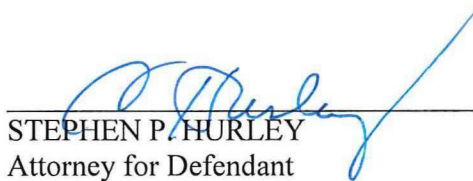
Date: 06.07.19



BRIAN L. GANOS
Defendant

I am the defendant's attorney. I carefully have reviewed every part of this addendum to the plea agreement with the defendant. To my knowledge, my client's decision to enter into this addendum to the plea agreement is an informed and voluntary one.

Date: 06.07.19



STEPHEN P. HURLEY
Attorney for Defendant


For the United States of America:

Date: 6/7/2019



MATTHEW D. KRUEGER
United States Attorney

Date: 6/7/2019



SCOTT J. CAMPBELL
ZACHARY J. COREY
MICHAEL A. CARTER
Assistant United States Attorneys